

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Norfolk Division)**

**KAY REDDITT, individually and as the  
Personal Representative of Thomas M.  
Lodahl**

Plaintiff,

v.

**LAW OFFICES OF SHAPIRO BROWN &  
ALT, LLP, et al.**

Defendants.

Case No. 2:12-CV-521-AWA-TEM

**[RULE 68] OFFER OF JUDGMENT**

Defendant Shapiro, Brown & Alt, LLP (“SBA”) and Professional Foreclosure Corporation of Virginia (“PFC”), by its undersigned counsel, pursuant to Fed. R. Civ. P. 68, hereby jointly submit this Offer of Judgment, which offers to allow judgment to be entered in favor of the Plaintiff Kay Redditt, individually and as the Personal Representative of Thomas M. Lodahl (hereafter referred to as “Plaintiff”) and against these Defendants, jointly and severally, as follows:

1. A single Judgment shall be entered against Defendants for damages in the aggregate amount of TWO THOUSAND AND FIVE HUNDRED DOLLARS (\$2500.00) arising from all of Plaintiff’s claims against Defendants as alleged in Plaintiff’s Complaint in the above captioned matter.

2. Separately from and in addition to the damages referred to in paragraph 1, *supra*, judgment shall be entered against Defendants, jointly and severally, and in favor of Plaintiff for Plaintiff’s costs of this action and a reasonable attorney’s fee incurred in this action; said fees and costs are to be in an amount as agreed to between counsel for the parties,



or if they are unable to agree, as determined by the Court upon application by Plaintiff's counsel, subject to objection and response by Defendants' counsel as to the reasonableness of the attorney fees and costs claimed by Plaintiff.

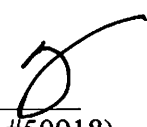
3. The judgment entered in accordance with this Offer of Judgment is to be in total settlement and resolution of any and all claims by Plaintiff in the above captioned case against Defendants and/or potential claims that could have been brought by Plaintiff against Defendants in this matter.

4. This Offer of Judgment is made solely for the purposes specified in Rule 68, and is not to be construed either as an admission against the Defendants or that Plaintiff has suffered any actual or other damage(s).

5. Notwithstanding the foregoing Offer, Defendant denies any wrongdoing or violation of state or federal laws, but offers judgment for the sole purposes of settlement and resolution of Plaintiff's claims sought in the above-captioned matter as described more fully herein.

Dated: February 28, 2012

Respectfully Submitted,  
**SHAPIRO, BROWN & ALT, LLP**  
**PROFESSIONAL FORECLOSURE**  
**CORPORATION OF VIRGINIA**  
*By Counsel*

/s/ Bizhan Beiramee   
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**CERTIFICATE OF SERVICE**

I hereby certify that effective the 28<sup>th</sup> day of February, 2013, I served a copy of the foregoing by email and first class mail, postage prepaid to the following:

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/s/ Bizhan Beiramee  
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